

C. Daniel Herrin  
State Bar No. 24065409  
HERRIN LAW, PLLC  
4925 Greenville Avenue, Suite 455  
Dallas, TX 75206  
(469) 607-8551 Phone  
(214) 722-0271 Fax  
ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE</b>	§	
	§	
<b>JULIO ALBERTO PEREZ</b>	§	<b>CASE NO. 10-36451-MVL</b>
<b>CECILIA PEREZ</b>	§	
<b>Debtors</b>	§	<b>CHAPTER 7</b>

**DEBTORS' RESPONSE TO OBJECTION TO EXEMPTIONS**

COMES NOW, **JULIO ALBERTO PEREZ AND CECILIA PEREZ**, (hereinafter, "Debtors") and files this their Response to the Trustee's Objection to Exemptions, (hereinafter, "Objection"), and in support thereof would respectfully show this Court the following:

1. Debtors filed a voluntary Chapter 7 bankruptcy petition on September 11, 2010.
2. On or about, October 15, 2010, the Debtors' 341 meeting was held and concluded.
3. On or about November 8, 2019, the Trustee moved to reopen the case and the case what reopen on December 11, 2019.
4. On or about May 1, 2020, C. Daniel Herrin filed a motion to substitute counsel that was granted on May 4, 2020.
5. On or about June 15, 2020, the Debtor's filed amended schedules updating the assets and exempting properly accordingly.
6. On or about, July 14, 2020, the objection to the Debtors' exemptions was filed by the Chapter 7 Trustee for improper exemptions of Debtor's personal property.

Answer to Objection to Debtor's Exemptions

7. Debtors denies allegations of paragraph 9 of the Motion.
8. Debtors denies allegations of paragraph 10, in its entirety, of the Motion.
9. Debtors cannot admit or deny allegations of paragraph 11 of the Motion as Debtors are without sufficient knowledge or information to form a belief as to the truth and therefore makes a qualified denial.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that the Objection be denied, and for such other relief that this Court deems fair and just.

Dated: August 4, 2020

Respectfully Submitted,

HERRIN LAW, PLLC

/s/ C. Daniel Herrin  
C. Daniel Herrin  
State Bar No. 24065409  
4925 Greenville Avenue, Suite 455  
Dallas, TX 75206  
(469) 607-8551 Phone  
(214) 722-0271 Fax